

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

KIMBERLY ROQUEMORE, Individually  
and as the Administratrix of the Estate of  
Maalik Roquemoire, Deceased,

Plaintiff,

vs.

CUYAHOGA METROPOLITAN  
HOUSING AUTHORITY, et al.,

Defendants.

CASE NO. 1:24-CV-01434

JUDGE DONALD C. NUGENT

**MOTION TO STAY DISCOVERY  
PENDING RULING ON MOTION FOR  
PARTIAL JUDGMENT ON THE  
PLEADINGS**

GRANTED: X DENIED: \_\_\_\_\_  
IT IS SO ORDERED.

Donald C. Nugent 2/27/25  
U.S. DISTRICT JUDGE

**I. INTRODUCTION**

Now comes Defendant, Jeffery Patterson (“Mr. Patterson”) and hereby moves to stay all written discovery issued to him by Plaintiff and on behalf of himself and the other named Defendants moves to stay any deposition requested by Plaintiff in this matter pending a ruling on Defendants’ pending Motion for Partial Judgment on the Pleadings.<sup>1</sup> As set forth in further detail below, Mr. Patterson is making this request in light of the immunity arguments set forth in Defendants’ Motion for Partial Judgment on the Pleadings and because Mr. Patterson is an apex executive-level employee who was not involved with the incident that occurred on September 5, 2022.

<sup>1</sup> The discovery deadline is currently September 1, 2025. As such, depending on the timing of this Court’s ruling on the pending Motion for Partial Judgment on the Pleadings, Defendants reserve the right to request a new discovery deadline following this Court’s ruling on Defendants’ pending Motion for Partial Judgment on the Pleadings should that be necessary.